



**THE
NAVAJO
NATION**

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JOE SHIRLEY, JR.
PRESIDENT
FRANK J. DAYISH, JR.
VICE PRESIDENT

May 27, 2005

Docket No. 05-015-1

Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

RE: Docket No. 05-015-1

Dear Sir,

The following statements are the responses from the Navajo Nation Tribal Government concerning the Draft Strategic Plan and the Draft Program Standards for the National Animal Identification System:

- It is encouraging that the USDA has included Tribal governmental roles and responsibilities within the Draft Program Standards document. The Navajo Nation has taken a proactive role concerning the implementation of premise registration and animal identification for cattle. Our efforts include the enactment of our Emergency Response to Foreign Animals Diseases (NNERFAD) and the critical review of the present Navajo Nation laws within the Navajo Nation Codes, Title III, Chapters 3, 5, 7, and 9, related to foreign animal disease adaptations.
- The Navajo Nation supports the mandatory identification program nationally as well as within the Navajo Nation borders. Our NNERFAD includes surveillance, monitoring, reporting and response activities for FAD incidence. The Navajo Nation has proposed laws for premise registration and animal identification for cattle in the Navajo Nation Code, Title III amendments.
- Market managers and fair managers should be responsible for communicating and enforcing the compliance of mandatory animal identification prior to unloading and commingling at any fair, facility or event. Should a FAD enter the fair premise or sale barn, it will be critical to trace back and trace forward all livestock and animals that participated within the event. The underlining importance of halting movement and isolation are critical to decrease the incidence and spread of a FAD. These facilities will require support from the states and tribes to assist to plan and include these events during the implementation phase of premise identification and animal identification. Additional monetary support from the USDA will be required to ensure that these facilities are in compliance.

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- The Navajo Nation Veterinary & Livestock Program will seek authorization to become a tagging site for Navajo cattle producers within each of the four agency clinics and as field herd services to the premise of the livestock owners for verification of the premise GPS coordinates as well as the proper tagging of livestock. Herd services and field education has been a legislated function of the NNVLP since it was established in 1982. The Navajo Nation supports the creation of certified tagging sites.
- Each livestock premise should be responsible for reporting entry and exit of livestock AIN. These sightings can begin at the point of origin and begin the history of sightings of individual livestock at veterinary clinics, leased pastured premise, sale barns or slaughters. The Navajo Nation has proposed through the Navajo Nation Code, Title III amendments to address livestock movement and reporting of premise changes.
- Most importantly, livestock should be identified prior to leaving the premise. One suggestion is the option of tagging prior weaning. This concept will influence the possibly of trace back procedures to a premise and determine genetic similarities in livestock for disease investigations that may require offspring trace back.
- Since the Navajo Nation has been proactive with the implementation of premise and animal identification within our borders, the timeline is supportive of our efforts provided that continued USDA support through cooperative agreements are available to assist with each phase and milestone leading to the 2009 mandatory regulations.
- The 2009 mandatory deadline for compliance with premise and animal identification should apply to cattle.
 - The sheep and goat protocols have yet to be developed. The Navajo Nation has a large population base of sheep & goats, our proposal for identification for these species will be proposed in the 2005 funding process as a cooperative effort with the Tri-National Livestock Health & Identification Consortium. An additional proposal will support the scrapie premise and identification activities over the last three years within the Navajo Nation.
 - Our equine identification on the Navajo Nation began in 1993 with microchip transponders on the left side of the equine mid-length and two inches from the mane. These equine have microchip numbers placed on veterinary certificates of health. A milestone for the NNVLP will be to support e-VCI implementation, transmission and reporting.
 - All other species requirements should follow the comment process to the public from the recommendations of the National Identification Development Team.
- Information submission to the USDA database will continue to be a challenge on the Navajo Nation. Support staff and the establishment of our brand office will assist to support data recording and reporting. Communication through outreach education to support registration and Id implementation is critical for the general Navajo-speaking public on the reservation. The Navajo infrastructure established will support data

- Mail and phone-in data submission will require additional staff; will these positions be funded by the USDA?
- Each livestock premise should be responsible for reporting entry and exit of livestock AIN. This will include both the buyer and the seller of livestock.
- The Navajo Nation will maintain premise and animal identification at the level of the AIN manager role. As a member of the regional Tri-National Livestock Health and Identification Consortium, the Navajo Nation will maintain records along side the third party, RMS certified contractor for our livestock records. As a tribal government, premise registration and animal identification will be maintained by the NNVLP and the newly established Navajo Brand Office through the National Premise Information Repository and the National Animal Records Repository.
 - The Navajo Nation will continue to seek cooperative agreement support from the USDA APHIS for the implementation of premise and animal identification.
 - All species should eventually be included as recommended by the NIDT, after public comment.

The Navajo Nation is presently in the Preparatory stage of development in the National NAIS measurement system. As a Tribal Nation, we will strive toward Stage II qualification for 35% Premise Identification by December, 2007.

The Nation appreciates the support of the USDA APHIS through the NNVLP and the Tri-National Livestock Health and Identification Consortium. Your continued support is invaluable for the implementation of premise registration and animal identification on the Navajo Nation.

Respectfully Submitted,


Joe Shirley, President
THE NAVAJO NATION

Respectfully Submitted,

DIVISION OF NATURAL RESOURCES


Arvin S. Trujillo
Executive Director

cc: Navajo Nation Animal Identification Team Membership
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